

EXHIBIT 2

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

ED BUTOWSKY,

Plaintiff,

V.

DAVID FOLKENFLIK, et al.,

Defendants.

CIVIL ACTION NO.

4:18-CV-00442-ALM

DECLARATION OF DAVID J. BODNEY

I, David J. Bodney, hereby declare pursuant to 28 U.S.C. § 1746:

1. I am a partner in the Phoenix office of Ballard Spahr LLP (“Ballard” or the “Firm”). I have practiced law in Arizona for over 40 years, and I am a member in good standing of the State Bar of Arizona. I am admitted to practice law in Arizona and have been admitted pro hac vice in the Eastern District of Texas, where I serve as co-counsel of record in this case for Defendants National Public Radio, Inc., David Folkenflik, Edith Chapin, Leslie Cook and Pallavi Gogoi (collectively, “NPR”). I submit this Declaration in support of NPR’s Application for Attorneys’ Fees and Costs Pursuant to Fed. R. Civ. P. 37(a)(5)(A). I serve as outside litigation counsel for NPR, and have personal knowledge of the facts stated herein, and if called upon, I could and would testify competently to them.

2. I submit this Declaration (a) to verify the legal fees incurred by NPR in bringing and briefing the Motion to Compel Discovery from Plaintiff (the “Motion to Compel”), and (b) without waiving the protections of the attorney-client privilege and work product doctrine.

3. In my capacity as counsel for NPR in connection with the Motion to Compel, I have been primarily responsible for (a) developing and implementing a strategy for the many issues raised by this Motion, (b) drafting and revising the Motion to Compel and Reply in Support of the Motion, (c) analyzing Plaintiff’s opposition papers and formulating NPR’s Reply, and (d) supervising the work of my associate, Ian Bucon, and support staff. To secure discovery from Plaintiff and his counsel, this Motion required persistence, a continuing assessment of Plaintiff’s shifting rationales for non-compliance and a detailed familiarity with documents and information subject to the Rules of Civil Procedure and Protective Order. Having litigated many defamation and other cases over the course of my career involving the importance of securing pretrial discovery from an adverse party, I relied upon my experience and judgment to brief the Motion to Compel as cost-efficiently, yet effectively, as possible.

4. I am the founding partner of Ballard’s Media and Entertainment Law Group, and a substantial amount of my practice over the years has involved defending news organizations and journalists in defamation and privacy-related litigation in numerous jurisdictions, both federal and state. In addition to my practice experience, I am active in the education of lawyers and law students, especially in these fields of law. For example, from 2014-16, I served as Chair of the American Bar Association’s Forum on Communications Law, writing columns for the ABA’s *Communications Lawyer* and moderating panels at the Forum’s annual conferences. For over 30 years, I have taught media law at Arizona State University’s Sandra Day O’Connor College of Law and Walter Cronkite School of Journalism and Mass Communication. In addition, I have

served as a member of the State Bar of Arizona's Committee on the Rules of Professional Responsibility, and have been appointed to serve on various committees to propose or amend Rules of the Arizona Supreme Court. A true and correct copy of my firm bio is attached as Exhibit A for ready reference.

5. In this matter, I have been assisted by Ian O. Bucon, a third-year litigation associate at the Firm. After graduating from Arizona State University's Sandra Day O'Connor College of Law, Mr. Bucon served as a law clerk for the Honorable Chief Justice Scott Bales of the Arizona Supreme Court. Mr. Bucon is a member in good standing of the State Bar of Arizona and is admitted pro hac vice in this action in the Eastern District of Texas. Since entering private practice, Mr. Bucon has focused on civil litigation matters in both state and federal courts and has litigated defamation-related matters on behalf of media clients. His substantial responsibilities in this matter included (a) drafting and revising the Motion to Compel and Reply in Support thereof, and (b) legal research and analysis, and (c) evaluating Plaintiff's responses to NPR's discovery requests within the meaning of the applicable rules and this Court's Orders. A true and correct copy of Mr. Bucon's firm bio is attached as Exhibit B for ready reference.

6. NPR engaged our services at modified billing rates that differ from the Firm's customary hourly rates for the attorneys who worked on this case. In the course of this matter, the Firm charged NPR \$485 per hour for my services, a significantly discounted rate from my customary hourly rate of \$710 in 2019 (and \$730 in 2020). The Firm also charged NPR \$395 per hour for Mr. Bucon's services. All of the fees incurred by NPR and requested by this Declaration have been paid. On information and belief, my billed hourly rate of \$485 is lower than the prevailing rates charged by comparable law firms in the community for similar services rendered by a lawyer of my experience. I base this statement on 40-plus years of practicing law that includes

having (a) served as a member of the executive committee and managing partner of the Phoenix office of Steptoe & Johnson LLP, a Washington, D.C.-based law firm with which I was a partner for 22 years (1992-2014), (b) chaired or co-chaired Ballard's Media and Entertainment Law Practice Group since 2014, (c) reviewed billing rate information for comparable law firms in such litigation, and (d) testified as an expert witness on the reasonableness of another firm's fees.

7. Without waiving the attorney-client privilege or work product protection, I attach as Exhibit C to this Declaration copies of Ballard's monthly invoices for professional services rendered to NPR in this matter from November 2019 through February 2020. These invoices were generated from true and correct contemporaneous time entries reflecting the work actually performed by the Firm's lawyers, the time involved in such services and the date(s) such services were rendered. The time-entry records were made at or near the time the hours were worked or reasonably soon thereafter, and were made in the course of a regularly conducted activity of the Firm. Time-entry records are made by each time keeper and kept by the Firm in the regular course of business. To preserve the attorney-client privilege and the confidentiality of work product, information has been redacted from this Exhibit C, but any redactions are clearly indicated as such. Exhibit C is heavily redacted because it contains references to all the many other services rendered for NPR during these four months on case activities unrelated to the Motion to Compel. On a monthly basis, I reviewed and approved the contemporaneous billing entries reflected in this Exhibit C, and the time spent and expenses billed in this matter were reasonable and necessary in the circumstances.

8. Exhibit D provides a comprehensive summary of the Firm's contemporaneous billing entries related to the Motion to Compel only. As Exhibit D shows, NPR seeks recovery of \$27,283.50 in attorneys' fees reasonably incurred by the Firm working on the Motion to Compel

from November 24, 2019 through February 17, 2020. To preserve the attorney-client privilege and work product protections, a small amount of information has been redacted from this Exhibit D, but any redactions are clearly indicated as such.

9. It merits note that NPR sought to reduce fees wherever possible. First and foremost, NPR's Motion to Compel would not have been necessary but for months of evasive maneuvers and stonewalling of document requests, formal and informal, by Plaintiff and his counsel. NPR's Application for Attorneys' Fees does not seek recovery of the many time charges incurred endeavoring to obtain discovery *before* the Motion to Compel became necessary. Second, billable tasks were assigned to and completed by the attorney or qualified professional with the lowest hourly rate, as much as ethically possible. By doing so, NPR was charged an effective billing rate by the Firm of approximately \$427 per hour, which is substantially lower than either my standard or discounted hourly billing rate in this matter. Third, NPR initiated and engaged in good-faith efforts to resolve informally any dispute about the reasonable amount of its attorneys' fees to be awarded *before* filing this Application for Attorneys' Fees, as shown in the Joint Report on Parties' Conference Regarding Attorneys' Fees Sought by Defendant's Motion to Compel Discovery (Dkt. 159). Plaintiff, through his counsel, offered only an unreasonable initial assessment of his responsibilities, and declined to respond to NPR's offer to compromise its claim.

10. For the foregoing reasons, I believe the attorneys' fees requested by NPR are fair and reasonable, and support NPR's request for an award of attorneys' fees incurred by Ballard on the Motion to Compel in the amount of \$27,283.50.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 24th day of June, 2020 in Phoenix, Arizona.

By: _____

David J. Bodney

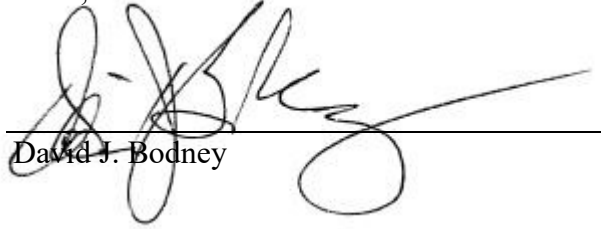
A handwritten signature in black ink, appearing to read 'David J. Bodney', is written over a horizontal line. The signature is stylized with large loops and a long horizontal stroke extending to the right.

EXHIBIT A

Attorney Profiles



David J. Bodney

Partner

1 East Washington Street, Suite 2300
Phoenix, AZ 85004
Direct: 602.798.5454 | Fax: 602.798.5595
bodneyd@ballardspahr.com

Areas of Focus

- Litigation
- Commercial Litigation
- Intellectual Property Litigation
- Media and Entertainment Law
- Government Relations and Public Policy
- Privacy and Data Security
- Appellate
- Political and Election Law

David J. Bodney, a litigator focusing on media and constitutional law, is founder of the firm's Media and Entertainment Law Group. For over 40 years, David has defended print, broadcast, and electronic media in defamation, privacy, and related First Amendment litigation. In addition, he has significant experience litigating complex commercial disputes; handling matters involving intellectual property, American Indian law, and governmental affairs issues; and briefing several high-profile cases in the U.S. Supreme Court.

David's practice covers a range of constitutional law issues, including prosecuting actions to secure open government, blocking prior restraints and subpoenas of reporters by government and third parties, and handling advertising, commercial speech, intellectual property law, and voting rights issues. In addition, he is regularly called upon to lobby and testify in legislative proceedings involving proposed legislation in a wide variety of issues.

David has co-authored the Arizona sections of the Media Law Resource Center's 50-State Surveys on privacy and employment privacy law since their inception. He has lectured on media law and litigation at conferences internationally, including presentations on extreme speech, libel, and mass media law in Cambridge, London, and Moscow, respectively.

For over four decades, David has worked to secure open government legislation on behalf of the publishing industry. In 1999, together with The Arizona Republic, he earned the Arizona Newspapers Association's Freedom of Information Award for his work in federal court on behalf of Phoenix Newspapers, Inc. He co-authored a monograph on freedom-of-information laws for the

Attorney Profiles

ABA's Central and East European Law Initiative to assist emerging democracies in the former Soviet Union with the enactment of FOI laws. David is a former legislative aide to U.S. Sen. John V. Tunney.

On the commercial side of his practice, David has litigated numerous complex disputes in the banking, education, publishing, retail and high-tech industries. He has handled securities, trademark, trade secrets, copyright, product liability, and contract actions, including AAA and other arbitrations. In addition, he has argued various appellate cases in both state and federal court.

David's practice of constitutional law extends to Indian law matters, and he advises clients on such issues as tribal governance, membership, sovereignty, taxation, gaming, and water rights. On behalf of one Indian tribe, he worked with U.S. Sen. John McCain to secure passage of a landmark Indian water rights settlement act. His work on Indian law encompasses government relations and litigation in federal, state, and tribal courts, including a voting rights case pending in the U.S. Supreme Court. In addition, David regularly represents clients on legislative and related public policy matters before governmental bodies, ranging from the U.S. Congress to local municipalities and regional transportation authorities.

Pro Bono and Community

For the Lawyers' Committee for Civil Rights Under Law, David serves as a member of the national Board of Directors and has overseen its "election protection" efforts in Arizona. On behalf of the City of Phoenix, he negotiated the City's acquisition of a historic school building in downtown Phoenix to house the Children's Museum of Phoenix. He has served as Chairman of the Board of the Children's Action Alliance and as Board Chair of the Arizona Center for Law in the Public Interest. In 2008, David received the prestigious Judge Learned Hand Award for his service to the community.

Professional Activities

American Bar Association, Immediate Past Chair, ABA Forum on Communications Law; Member, Forum's Governing Committee; Member, Editorial Advisory Board of ABA's *Communications Lawyer*

State Bar of Arizona, former member, Professionalism Committee, Task Force on Access to Justice

National Commission of the Anti-Defamation League, 2008-2016; Honorary Lifetime Member, 2017-present

Attorney Profiles

Arizona Supreme Court's Committee on the Impact of Wireless, Mobile Technologies, and Social Media on Court Proceedings

Arizona Supreme Court's Committee on Time Periods for Electronic Display of Court Records

Arizona State University's Sandra Day O'Connor College of Law and Walter Cronkite School of Journalism and Mass Communication, Adjunct Faculty (teaching media law), 1988-present; Arizona Chief Justice's Commission on Juvenile Justice, past member

Arizona Judicial Council's Committee to Study Public Access to Electronic Records, past member

Civil Liberties Adviser to the White House Commission on Aviation Safety and Security (appointed by Vice President Al Gore, 1997)

Judge Learned Hand Award Selection Committee

Ballard Spahr's Diversity and Inclusion Council

Recognition & Accomplishments

Recognized in *AzBusiness Leaders* magazine under Native American Law, 2019

Named to the Top 100 Lawyers, *Arizona Business* magazine, 2015

Chambers USA, First Amendment litigation (nationwide), 2013, 2015-2017, 2019, 2020

The Best Lawyers in America, advertising law, First Amendment litigation, media law, 1995-2020

Southwest Super Lawyers, First Amendment, media, and advertising, 2007-2017

Named as one of *Arizona Capitol Times 2014* Leaders of the Year in Public Policy, in the area of open government

Named among Arizona Business Magazine's Arizona's Top Lawyers, intellectual property, 2013

Who's Who in American Law and Who's Who in America, 1995-2020

Recipient, Arizona Region of the Anti-Defamation League's Torch of Liberty Award, 2013

Recipient, Valle Del Sol's Arizona Public Service Peacemaker Award, 2011

Attorney Profiles

Recipient, American Jewish Committee's Judge Learned Hand Award for Community Service, 2008

Publications

Co-author, "Ninth Circuit Rules California 'No Credit Card Surcharge' Law Violates First Amendment," Ballard Spahr alert, January 8, 2018

Contributor, *Extreme Speech and Democracy*, Oxford University Press, 2009

"A Persuasive Colloquy: Book Review of *Making Your Own Case: The Art of Persuading Judges*," *Arizona Attorney*, July/August 2008

"War, Wisdom, and Freedom of the Press," *Communications Lawyer*, December 1, 2002

Recent Speaking Engagements

"Hearings in the Headlines: A Panel Discussion about the Relationship between the Media and the Courts, First Amendment Implications and What is 'Newsworthy'," 2018 Maricopa County Judicial Education Day, Mesa, AZ, October 26, 2018

"Fake News, Enemies of the People and Freedom of the Press: Not Exactly What the Founders Had in Mind?" State Bar of Arizona CLE, October 23, 2018

"Press, Politics and the Public: President Trump and the First Amendment," Walter Cronkite School of Journalism and Mass Communication, Phoenix, Arizona, January 31, 2017

"Technology, Social Media and Public Records in the Lobbying Context: Navigating the Legal, Ethical and Practical Considerations," Faculty, State Bar of Arizona CLE, "A Funny Thing Happened on the Way to the Capitol," June 1, 2016

"Balancing National Security and Religious Liberty in the United States," The Melikian Center: Russian, Eurasian and Eastern European Studies, Arizona State University, October 9, 2015

"Free Speech, Privacy & Technology," Arizona State University Sandra Day O'Connor College of Law, Scottsdale, Arizona, May 27, 2015

"Newsgathering and Reporting in the Year 2015," ABA Forum on Communications Law, Las Vegas, April 12, 2015

Attorney Profiles

"Current Trends in Discovery, Disclosure, ADR, and Expert Witness Preparation and Testimony," State Bar of Arizona CLE by the Sea, July 20, 2013

10th Annual Labor Relations Conference, co-sponsored by the Arizona Society for Human Resources Management and *Az Business Magazine*, May 3, 2013

"Higher Education and Creating a Culture of Philanthropy," Yale Global Alumni Leadership Exchange, New Asia College, Hong Kong, July 30, 2011

"Wikileaks, Free Speech and National Security, Center for Law and Global Affairs," ASU's Sandra Day O'Connor College of Law, February 11, 2011

Board Memberships

University of Arizona, James E. Rogers College of Law, Board of Visitors

First Amendment Coalition of Arizona, Board of Directors

Yale Global Alumni Leadership Exchange, Board Member

Lawyers' Committee for Civil Rights Under Law, Director, 2006-present

Arizona State University's Walter Cronkite School of Journalism and Mass Communication Chair, Endowment Board, 2013-2015

Anti-Defamation League, Arizona Region, former Board Chair

Children's Action Alliance, former Board Chair

Arizona Center for Law in the Public Interest, former Board Chair

Education

University of Virginia School of Law (J.D. 1979, M.A. Foreign Affairs 1979)
Senior Editor, *Virginia Journal of International Law*

Yale University (B.A. 1976, *cum laude*)
Recipient, Thatcher Memorial Prize for Extemporaneous Debate

Attorney Profiles

Admissions

Arizona

California (admitted *pro hac vice*)

U.S. District Court for the District of Arizona

U.S. District Court for the Southern District of Florida

U.S. District Court for the Northern District of Illinois

U.S. District Court for the Eastern District of Michigan

U.S. District Court for the Eastern District of New York

U.S. Court of Appeals for the Second Circuit

U.S. Court of Appeals for the Ninth Circuit

U.S. Supreme Court

EXHIBIT B

Attorney Profiles



Ian O. Bucon

Associate

1 East Washington Street, Suite 2300
Phoenix, AZ 85004
Direct: 602.798.5522 | Fax: 602.798.5595
buconi@ballardspahr.com

Areas of Focus

- Litigation

Ian O. Bucon is an associate in the Litigation Department. As a law student, Ian interned for two semesters with the Post Conviction Clinic and served on the board of directors for the Arizona Justice Project, an organization that seeks justice for the innocent and wrongfully imprisoned, where he reviewed and researched claims of innocence on behalf of incarcerated individuals. He also appeared on behalf of an Arizona Justice Project client in front of the Arizona Board of Executive Clemency.

Before law school, he was a volunteer coordinator for a Deferred Action for Childhood Arrival (DACA) application workshop and worked with the Loyola Academy at Brophy College Preparatory.

Ian is a former Ballard Spahr summer associate.

Judicial Clerkship

Chief Justice Scott Bales, Arizona Supreme Court, 2017-2018

Judicial Externship

Hon. David G. Campbell, U.S. District Court for the District of Arizona, 2015

Board Memberships

Arizona Justice Project, Board of Directors, 2014-2015

Attorney Profiles

Education

Arizona State University, Sandra Day O'Connor College of Law (J.D., *cum laude*, 2017)

Research Editor, *Arizona State Law Journal*

CALI Award for Torts, Legal Method and Writing

Recipient, Highest Pro Bono Distinction

Georgetown University (B.S., *magna cum laude*, 2010)

Languages

Spanish (fluent)

Admissions

Arizona

U.S. District Court for the District of Arizona

EXHIBIT C

INVOICE SUMMARY

PROFESSIONAL SERVICES

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PROFESSIONAL SERVICES

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Bucon,I.O.	11/24/19	Research Fifth Circuit case law re: motion to compel discovery pursuant to Fed. R. Civ. P. 37.	395.00	0.60	237.00
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PROFESSIONAL SERVICES

<u>Name</u>	<u>Date</u>	<u>Description</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
[REDACTED]	[REDACTED]	[REDACTED] [REDACTED] [REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]					
[REDACTED]					
[REDACTED]					
[REDACTED]					
Bucon,I.O.	11/25/19	Review local rules re: discovery [REDACTED] to prepare to draft motion to compel discovery from Plaintiff.	395.00	0.20	79.00
[REDACTED]					
[REDACTED]					
[REDACTED]	[REDACTED]	[REDACTED] [REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED] [REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED] [REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]					
[REDACTED]					
[REDACTED]	[REDACTED]	[REDACTED] [REDACTED] [REDACTED] [REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED] [REDACTED] [REDACTED] [REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]					
[REDACTED]					

PROFESSIONAL SERVICES

<u>Name</u>	<u>Date</u>	<u>Description</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
[REDACTED]	[REDACTED]	[REDACTED] [REDACTED] [REDACTED] [REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED] [REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED] [REDACTED] [REDACTED] [REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]				<hr/>	<hr/>
[REDACTED]				[REDACTED]	[REDACTED]
[REDACTED]				<hr/>	<hr/>
[REDACTED]				[REDACTED]	[REDACTED]
[REDACTED]					
[REDACTED]	[REDACTED]	[REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]				<hr/>	<hr/>
[REDACTED]				[REDACTED]	[REDACTED]
[REDACTED]					
[REDACTED]	[REDACTED]	[REDACTED] [REDACTED] [REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]				<hr/>	<hr/>
[REDACTED]				[REDACTED]	[REDACTED]
[REDACTED]					
[REDACTED]	[REDACTED]	[REDACTED] [REDACTED] [REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]				<hr/>	<hr/>
[REDACTED]				[REDACTED]	[REDACTED]
Bucon,I.O.	11/25/19	Draft motion to compel discovery from Plaintiff pursuant to Fed. R. Civ. P. 37.	395.00	0.90	355.50
Bucon,I.O.	11/26/19	Continue to draft motion to compel discovery from Plaintiff pursuant to Fed. R. Civ. P. 37.	395.00	1.20	474.00

PROFESSIONAL SERVICES

[illegible]

PROFESSIONAL SERVICES

[illegible]

Category	Item	Value
Total	Item 1	100
	Item 2	200
	Item 3	300
	Item 4	400
Subtotal	Item 1	100
	Item 2	200
	Item 3	300
	Item 4	400

20191205406
December 11, 2019



1 East Washington Street, Suite 2300
Phoenix, AZ 85004-2555
Tel 602.798.5400
Fax 602.798.5595
www.ballardspahr.com

[REDACTED]

REMITTANCE ADVICE

Client: 072075.00 National Public Radio (NPR)
Matter: 00297341 NPR, et al. adv. Butowsky
Invoice No.: 20191205406
Date: December 11, 2019

[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]

[REDACTED]	
[REDACTED]	
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	

20200103820
January 17, 2020

PROFESSIONAL SERVICES

<u>Name</u>	<u>Date</u>	<u>Description</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
[REDACTED]					
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		[REDACTED]			
		[REDACTED]			
		[REDACTED]			
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		[REDACTED]			
[REDACTED]					
[REDACTED]					
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		[REDACTED]			
		[REDACTED]			
		[REDACTED]			
		[REDACTED]			
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		[REDACTED]			
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		[REDACTED]			
		[REDACTED]			
		[REDACTED]			
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		[REDACTED]			
		[REDACTED]			
		[REDACTED]			
[REDACTED]					
[REDACTED]					
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		[REDACTED]			
[REDACTED]					
[REDACTED]					

PROFESSIONAL SERVICES

<u>Name</u>	<u>Date</u>	<u>Description</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
[REDACTED]				[REDACTED]	[REDACTED]
[REDACTED]					
[REDACTED]					
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		[REDACTED]			
[REDACTED]				[REDACTED]	[REDACTED]
[REDACTED]				[REDACTED]	[REDACTED]
[REDACTED]					
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		[REDACTED]			
		[REDACTED]			
[REDACTED]				[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		[REDACTED]			
[REDACTED]				[REDACTED]	[REDACTED]
[REDACTED]				[REDACTED]	[REDACTED]
[REDACTED]					
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		[REDACTED]			
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		[REDACTED]			
[REDACTED]				[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		[REDACTED]			
		[REDACTED]			
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		[REDACTED]			

PROFESSIONAL SERVICES

[illegible]

PROFESSIONAL SERVICES

Name	Date	Description	Rate	Hours	Amount
[REDACTED]				[REDACTED]	[REDACTED]
[REDACTED]				[REDACTED]	[REDACTED]
[REDACTED]					
Bucon,I.O.	12/31/19	Review and analyze plaintiff's document production [REDACTED] motion to compel discovery.	395.00	2.50	987.50
[REDACTED]				[REDACTED]	[REDACTED]
[REDACTED]				[REDACTED]	[REDACTED]
[REDACTED]					
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]				[REDACTED]	[REDACTED]
[REDACTED]					
Bucon,I.O.	12/10/19	Research and analysis of Fifth Circuit case law re: discovery objections, motion to compel and sanctions.	395.00	1.00	395.00
Bucon,I.O.	12/12/19	Research and analyze Fifth Circuit case law re: Rule 37 motions to compel discovery and sanctions.	395.00	1.80	711.00
[REDACTED]	[REDACTED]	[REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

PROFESSIONAL SERVICES

<u>Name</u>	<u>Date</u>	<u>Description</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
[REDACTED]	[REDACTED]	[REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED] [REDACTED] [REDACTED] [REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED] [REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED] [REDACTED] [REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
Bucon,I.O.	12/10/19	Draft motion to compel discovery re: plaintiff's deficient discovery responses.	395.00	0.70	276.50
Bucon,I.O.	12/11/19	Draft motion to compel discovery re: plaintiff's discovery deficiencies.	395.00	1.50	592.50
Bucon,I.O.	12/12/19	Draft motion to compel discovery from plaintiff.	395.00	2.00	790.00
[REDACTED]	[REDACTED]	[REDACTED] [REDACTED] [REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
Bodney,D.	12/13/19	Revise draft Motion to Compel Discovery	485.00	0.80	388.00

PROFESSIONAL SERVICES

<u>Name</u>	<u>Date</u>	<u>Description</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
Bucon,I.O.	12/17/19	Draft, review and revise motion to compel discovery in light of plaintiff's initial document production.	395.00	3.00	1,185.00
[REDACTED]	[REDACTED]	[REDACTED] [REDACTED].	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED] [REDACTED] [REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]				[REDACTED]	[REDACTED]
[REDACTED]					
[REDACTED]	[REDACTED]	[REDACTED] [REDACTED] [REDACTED] [REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED] [REDACTED] [REDACTED] [REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED] [REDACTED] [REDACTED] [REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED] [REDACTED] [REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED] [REDACTED] [REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED] [REDACTED] [REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

PROFESSIONAL SERVICES

<u>Name</u>	<u>Date</u>	<u>Description</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
[REDACTED]	[REDACTED]	[REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED] [REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED] [REDACTED] [REDACTED] [REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED] [REDACTED] [REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED] [REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED] [REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
Bodney,D.	12/12/19	Analysis of issues in motion to compel	485.00	0.20	97.00
[REDACTED]	[REDACTED]	[REDACTED] [REDACTED] [REDACTED] [REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED] [REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED] [REDACTED] [REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED] [REDACTED] [REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED] [REDACTED] [REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

PROFESSIONAL SERVICES

[illegible]

PROFESSIONAL SERVICES

[illegible]

PROFESSIONAL SERVICES

Name	Date	Description	Rate	Hours	Amount
[REDACTED]	[REDACTED]	[REDACTED] [REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED] [REDACTED] [REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]				[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED] [REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]				[REDACTED]	[REDACTED]
[REDACTED]				[REDACTED]	[REDACTED]
[REDACTED]				[REDACTED]	[REDACTED]
Bucon,I.O.	12/31/19	Review and revise motion to compel discovery [REDACTED] [REDACTED] [REDACTED] [REDACTED]	395.00	2.60	1,027.00
[REDACTED]				[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED] [REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED] [REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
Bucon,I.O.	12/30/19	Review and revise motion to compel discovery [REDACTED] [REDACTED] [REDACTED] [REDACTED]	395.00	2.90	1,145.50
[REDACTED]				[REDACTED]	[REDACTED]

PROFESSIONAL SERVICES

[illegible]

Category	Value	Category	Value	Category	Value
1	100	1	100	1	100
2	50	2	50	2	50
3	25	3	25	3	25
4	12.5	4	12.5	4	12.5
5	6.25	5	6.25	5	6.25
6	3.125	6	3.125	6	3.125
7	1.5625	7	1.5625	7	1.5625
8	0.78125	8	0.78125	8	0.78125
9	0.390625	9	0.390625	9	0.390625
10	0.1953125	10	0.1953125	10	0.1953125
11	0.09765625	11	0.09765625	11	0.09765625
12	0.048828125	12	0.048828125	12	0.048828125
13	0.0244140625	13	0.0244140625	13	0.0244140625
14	0.01220703125	14	0.01220703125	14	0.01220703125
15	0.006103515625	15	0.006103515625	15	0.006103515625
16	0.0030517578125	16	0.0030517578125	16	0.0030517578125
17	0.00152587890625	17	0.00152587890625	17	0.00152587890625
18	0.000762939453125	18	0.000762939453125	18	0.000762939453125
19	0.0003814697265625	19	0.0003814697265625	19	0.0003814697265625
20	0.00019073486328125	20	0.00019073486328125	20	0.00019073486328125
21	9.5367431640625e-05	21	9.5367431640625e-05	21	9.5367431640625e-05
22	4.76837158203125e-05	22	4.76837158203125e-05	22	4.76837158203125e-05
23	2.384185791015625e-05	23	2.384185791015625e-05	23	2.384185791015625e-05
24	1.1920928955078125e-05	24	1.1920928955078125e-05	24	1.1920928955078125e-05
25	5.9604644775390625e-06	25	5.9604644775390625e-06	25	5.9604644775390625e-06
26	2.9802322387695312e-06	26	2.9802322387695312e-06	26	2.9802322387695312e-06
27	1.4901161193847656e-06	27	1.4901161193847656e-06	27	1.4901161193847656e-06
28	7.450580596923828e-07	28	7.450580596923828e-07	28	7.450580596923828e-07
29	3.725290298461914e-07	29	3.725290298461914e-07	29	3.725290298461914e-07
30	1.862645149230957e-07	30	1.862645149230957e-07	30	1.862645149230957e-07
31	9.313225746154785e-08	31	9.313225746154785e-08	31	9.313225746154785e-08
32	4.656612873077392e-08	32	4.656612873077392e-08	32	4.656612873077392e-08
33	2.328306436538696e-08	33	2.328306436538696e-08	33	2.328306436538696e-08
34	1.164153218269348e-08	34	1.164153218269348e-08	34	1.164153218269348e-08
35	5.82076609134674e-09	35	5.82076609134674e-09	35	5.82076609134674e-09
36	2.91038304567337e-09	36	2.91038304567337e-09	36	2.91038304567337e-09
37	1.455191522836685e-09	37	1.455191522836685e-09	37	1.455191522836685e-09
38	7.275957614183425e-10	38	7.275957614183425e-10	38	7.275957614183425e-10
39	3.637978807091712e-10	39	3.637978807091712e-10	39	3.637978807091712e-10
40	1.818989403545856e-10	40	1.818989403545856e-10	40	1.818989403545856e-10
41	9.09494701772928e-11	41	9.09494701772928e-11	41	9.09494701772928e-11
42	4.54747350886464e-11	42	4.54747350886464e-11	42	4.54747350886464e-11
43	2.27373675443232e-11				

Age Group	Take More Action (%)	Take Less Action (%)
18-29	78	22
30-49	72	28
50-69	28	72
70+	22	78

[illegible]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]



1 East Washington Street, Suite 2300
Phoenix, AZ 85004-2555
Tel 602.798.5400
Fax 602.798.5595
www.ballardspahr.com

[Redacted]

REMITTANCE ADVICE

Client: 072075.00 National Public Radio (NPR)
Matter: 00297341 NPR, et al. adv. Butowsky
Invoice No.: 20200103820
Date: January 17, 2020

[Redacted]	[Redacted]
[Redacted]	[Redacted]
[Redacted]	[Redacted]
[Redacted]	[Redacted]
[Redacted]	[Redacted]

[Redacted]	
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[Redacted]	[Redacted]
[Redacted]	[Redacted]
[Redacted]	[Redacted]
[Redacted]	[Redacted]
[Redacted]	

INVOICE SUMMARY

PROFESSIONAL SERVICES

<u>Name</u>	<u>Date</u>	<u>Description</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
[REDACTED]					
[REDACTED]					
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		[REDACTED]			
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
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		[REDACTED]			
		[REDACTED]			
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		[REDACTED]			
		[REDACTED]			
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		[REDACTED]			
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		[REDACTED]			
		[REDACTED]			
		[REDACTED]			
				[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		[REDACTED]			
		[REDACTED]			
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		[REDACTED]			
		[REDACTED]			
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		[REDACTED]			
		[REDACTED]			
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[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]0
		[REDACTED]			
		[REDACTED]			
		[REDACTED]			

PROFESSIONAL SERVICES

<u>Name</u>	<u>Date</u>	<u>Description</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
[REDACTED]	[REDACTED]	[REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED] [REDACTED] [REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED] [REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]				[REDACTED]	[REDACTED]
[REDACTED]				[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED] [REDACTED] [REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED] [REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED] [REDACTED] [REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]				[REDACTED]	[REDACTED]
[REDACTED]				[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED] [REDACTED] [REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED] [REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]				[REDACTED]	[REDACTED]
[REDACTED]				[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED] [REDACTED] [REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED] [REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]				[REDACTED]	[REDACTED]
[REDACTED]				[REDACTED]	[REDACTED]

PROFESSIONAL SERVICES

<u>Name</u>	<u>Date</u>	<u>Description</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
[REDACTED]					
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		[REDACTED]			
[REDACTED]				[REDACTED]	[REDACTED]
[REDACTED]				[REDACTED]	[REDACTED]
[REDACTED]					
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		[REDACTED]			
		[REDACTED]			
[REDACTED]				[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		[REDACTED]			
[REDACTED]				[REDACTED]	[REDACTED]
[REDACTED]				[REDACTED]	[REDACTED]
[REDACTED]					
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		[REDACTED]			
		[REDACTED]			
[REDACTED]				[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		[REDACTED]			
[REDACTED]				[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		[REDACTED]			
		[REDACTED]			
[REDACTED]				[REDACTED]	[REDACTED]

PROFESSIONAL SERVICES

<u>Name</u>	<u>Date</u>	<u>Description</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
[REDACTED]					
Bucon,I.O.	01/02/20	Review and revise motion to compel plaintiff to comply with defendants' discovery requests.	395.00	1.00	395.00
[REDACTED]	[REDACTED]	[REDACTED] [REDACTED].	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED] [REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]0
Bodney,D.	01/09/20	Revise motion to compel discovery.	485.00	2.00	970.00
Bodney,D.	01/10/20	Revise motion to compel and W. Lewis Declaration, including references to rules and exhibits.	485.00	3.00	1,455.00
Bodney,D.	01/11/20	Revise draft Motion to Compel and Declaration.	485.00	3.70	1,794.50
[REDACTED]	[REDACTED]	[REDACTED] [REDACTED] [REDACTED] [REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED] [REDACTED] [REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED] [REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED] [REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED] [REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]0

PROFESSIONAL SERVICES

<u>Name</u>	<u>Date</u>	<u>Description</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
[REDACTED]	[REDACTED]	[REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED] [REDACTED] [REDACTED] [REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED] [REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]				[REDACTED]	[REDACTED]
[REDACTED]					
[REDACTED]	[REDACTED]	[REDACTED] [REDACTED] [REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED] [REDACTED] [REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED] [REDACTED] [REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
Bucon,I.O.	01/09/20	Review and evaluate revised motion to compel plaintiff's discovery responses.	395.00	0.50	197.50
[REDACTED]	[REDACTED]	[REDACTED] [REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
Bucon,I.O.	01/13/20	Review and revise motion to compel discovery from plaintiff and supporting documents prior to filing.	395.00	1.50	592.50
Bodney,D.	01/13/20	Attention to service and filing issues stemming from Motion to Compel.	485.00	0.20	97.00
Bodney,D.	01/13/20	Review client's suggested edits to motion to compel.	485.00	0.10	48.50

PROFESSIONAL SERVICES

<u>Name</u>	<u>Date</u>	<u>Description</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
Bucon,I.O.	01/14/20	Review and analyze stipulated protective order to evaluate scope of necessary redactions for public motion to compel.	395.00	1.30	513.50
Bodney,D.	01/14/20	Review Order re duty to file redacted Motion to Compel.	485.00	0.10	48.50
Bucon,I.O.	01/15/20	Review motion to compel and evaluate redactions necessary to prevent disclosure of information protected by stipulated protective order.	395.00	2.50	987.50
Bodney,D.	01/15/20	Review, analyze and supplement proposed redacted versions of motion to compel and exhibits thereto.	485.00	0.40	194.00
[REDACTED]	[REDACTED]	[REDACTED] [REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED] [REDACTED] [REDACTED] [REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED] [REDACTED] [REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED] [REDACTED] [REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED] [REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED] [REDACTED] [REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED] [REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED] [REDACTED] [REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]				[REDACTED]	[REDACTED]
[REDACTED]					
Bodney,D.	01/13/20	Conferences with I. Bucon re filing of Motion to Compel under seal and possible redactions.	485.00	0.20	97.00

PROFESSIONAL SERVICES

<u>Name</u>	<u>Date</u>	<u>Description</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
██████████	██████████	██ ██ ██ ██ ██████████	██████████	██████████	██████████
██████████	██████████	██ ██ ██ ██	██████████	██████████	██████████
██████████				██████████	██████████
██████████					██████████
Bodney,D.	01/09/20	Teleconference with ██████████ ██ re motion to compel.	485.00	0.50	242.50
Bodney,D.	01/10/20	Teleconference with ██████████ re motion to compel ██████████.	485.00	0.10	48.50
Bodney,D.	01/11/20	Electronic communication with client re draft Motion to Compel and Declaration in support thereof.	485.00	0.20	97.00
Bodney,D.	01/13/20	Electronic communications with ██████████ re ██ Motion to Compel.	485.00	0.10	48.50
██████████	██████████	██ ██ ██	██████████	██████████	██████████
██████████	██████████	██ ██	██████████	██████████	██████████
Bodney,D.	01/15/20	Electronic communications with client re ██ ██ motion to compel ██████████.	485.00	0.10	48.50
Bodney,D.	01/16/20	Electronic communication with ██████████ ██████████ re ██████████ motion to compel.	485.00	0.10	48.50
██████████	██████████	██ ██	██████████	██████████	██████████

PROFESSIONAL SERVICES

PROFESSIONAL SERVICES

[illegible]

PROFESSIONAL SERVICES

[illegible]

PROFESSIONAL SERVICES

[illegible]

PROFESSIONAL SERVICES

[illegible]

[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
Bucon,I.O.	01/13/20	Review and analyze plaintiff's document production [REDACTED] motion to compel and accompanying declaration.	395.00	1.00	395.00
Bucon,I.O.	01/13/20	Evaluate scope of protective order [REDACTED] motion to compel discovery [REDACTED].	395.00	0.30	118.50
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

PROFESSIONAL SERVICES

[illegible]

PROFESSIONAL SERVICES

<u>Name</u>	<u>Date</u>	<u>Description</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
[REDACTED]	[REDACTED]	[REDACTED] [REDACTED] [REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED] [REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED] [REDACTED] [REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED] [REDACTED] [REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED] [REDACTED] [REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED] [REDACTED] [REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED] [REDACTED] [REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
Bodney,D.	01/14/20	Follow-up with W. Lewis and I. Bucon re redaction of Motion to Compel and Exhibits.	485.00	0.20	97.00
[REDACTED]	[REDACTED]	[REDACTED] [REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED] [REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED] [REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

PROFESSIONAL SERVICES

[illegible]

2019		2020		2021	
1	100	100	100	100	100
2	100	100	100	100	100
3	100	100	100	100	100
4	100	100	100	100	100
5	100	100	100	100	100
6	100	100	100	100	100
7	100	100	100	100	100
8	100	100	100	100	100
9	100	100	100	100	100
10	100	100	100	100	100
11	100	100	100	100	100
12	100	100	100	100	100
13	100	100	100	100	100
14	100	100	100	100	100
15	100	100	100	100	100
16	100	100	100	100	100
17	100	100	100	100	100
18	100	100	100	100	100
19	100	100	100	100	100
20	100	100	100	100	100
21	100	100	100	100	100
22	100	100	100	100	100
23	100	100	100	100	100
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25	100	100	100	100	100
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29	100	100	100	100	100
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31	100	100	100	100	100
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54	100	100	100	100	100
55	100	100	100	100	100
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57	100	100	100	100	100
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59	100	100	100	100	100
60	100	100	100	100	100
61	100	100	100	100	100
62	100	100	100	100	100
63	100	100	100	100	100
64	100	100	100	100	100
65	100	100	100	100	100
66	100	100	100	100	100
67	100	100	100	100	100
68	100	1			

Country	Year	Value
United States	2010	100
United States	2011	100
United States	2012	100
United States	2013	100
United States	2014	100
United States	2015	100
United States	2016	100
United States	2017	100
United States	2018	100
United States	2019	100
United States	2020	100
United States	2021	100
United States	2022	100
United States	2023	100
United States	2024	100
United States	2025	100
United States	2026	100
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United States	2090	100
United States	2091	100
United States	2092	100
United States	2093	100
United States	2094	100
United States	2095	100
United States	2096	100
United States	2097	100
United States	2098	100
United States	2099	100
United States	2100	100

[illegible]

Government	Percentage
Current government	75%
Previous government	25%

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Client:	072075.00	National Public Radio (NPR)
Matter:	00297341	NPR, et al. adv. Butowsky
Invoice No.:	20200203345	
Date:	February 18, 2020	

Category	Value
Category 1	Value 1
Category 2	Value 2
Category 3	Value 3
Category 4	Value 4
Category 5	Value 5

INVOICE SUMMARY

PROFESSIONAL SERVICES

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
02/03/20	Bodney,D.	Review and analysis of Plaintiff's Response to Motion to Compel	0.20	97.00
[REDACTED]	[REDACTED]	[REDACTED] [REDACTED] [REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED] [REDACTED] [REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED] [REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED] [REDACTED] [REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED] [REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED] [REDACTED]	[REDACTED]	[REDACTED]
02/04/20	Bodney,D.	Electronic communications with L. Prather re: reply in support of motion to compel	0.20	97.00
[REDACTED]	[REDACTED]	[REDACTED] [REDACTED]	[REDACTED]	[REDACTED]
02/04/20	Bucon,I.O.	Review and evaluate Plaintiff's Response to Defendants' Motion to Compel Discovery	0.50	197.50
[REDACTED]	[REDACTED]	[REDACTED] [REDACTED]	[REDACTED]	[REDACTED]
02/06/20	Bodney,D.	Review client e-mail re: [REDACTED] reply in support of motion to compel	0.20	97.00
[REDACTED]	[REDACTED]	[REDACTED] [REDACTED] [REDACTED]	[REDACTED]	[REDACTED]

PROFESSIONAL SERVICES

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
02/06/20	Bucon,I.O.	E-mail correspondence from [REDACTED] re: reply in support of motion to compel discovery from plaintiff	0.10	39.50
02/07/20	Bodney,D.	Electronic communications with client and defense team re: reply in support of motion to compel	0.30	145.50
02/07/20	Bucon,I.O.	Review and evaluate reply in support of motion to compel discovery from plaintiff [REDACTED] [REDACTED]	0.80	316.00
02/08/20	Bodney,D.	Conference with W. Lewis and I. Bucon re: Reply in Support of Motion to Compel	0.40	194.00
[REDACTED]	[REDACTED]	[REDACTED] [REDACTED]	[REDACTED]	[REDACTED]
02/10/20	Bodney,D.	Electronic communications with defense team re: [REDACTED] Motion to Compel	0.10	48.50
[REDACTED]	[REDACTED]	[REDACTED] [REDACTED] [REDACTED] [REDACTED]	[REDACTED]	[REDACTED]
02/10/20	Bodney,D.	Review and revise outline of Reply in Support of Motion to Compel	0.50	242.50
[REDACTED]	[REDACTED]	[REDACTED] [REDACTED] [REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED] [REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED] [REDACTED] [REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED] [REDACTED] [REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	0

PROFESSIONAL SERVICES

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
02/12/20	Bodney,D.	Review and revise Reply in Support of Motion to Compel Discovery Pursuant to Fed. R. Civ. P. 37	1.50	727.50
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
02/12/20	Bodney,D.	Electronic communications with L. Prather re: [REDACTED] Motion to Compel	0.20	97.00
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
02/12/20	Bucon,I.O.	Review, evaluate and revise draft reply in support of motion to compel discovery	2.70	1,066.50
02/13/20	Bodney,D.	Teleconference with [REDACTED] re: Reply in Support of Motion to Compel	0.20	97.00
02/13/20	Bodney,D.	Electronic communications with client re: [REDACTED] Reply in Support of Motion to Compel [REDACTED]	0.20	97.00

PROFESSIONAL SERVICES

[illegible]

PROFESSIONAL SERVICES

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
02/14/20	Bodney,D.	Review and analysis of proposed exhibits to Reply in Support of Motion to Compel	0.20	97.00
02/14/20	Bodney,D.	Review [REDACTED] Reply in Support of Motion to Compel	0.30	145.50
02/14/20	Bodney,D.	Review and revise draft Reply in Support of Motion to Compel	0.70	339.50
02/14/20	Bucon,I.O.	Review, evaluate and proof citations to record and exhibits in draft Reply in support of Motion to Compel	1.50	592.50
02/14/20	Bucon,I.O.	Confer with D. Bodney and W. Lewis re: [REDACTED] [REDACTED] Reply in support of Defendants' Motion to Compel Discovery	0.20	79.00
02/15/20	Bodney,D.	Review and revise draft Declaration in Support of Reply in Support of Motion to Compel Discovery Pursuant to Fed. R. Cir. P 37	0.70	339.50
02/15/20	Bodney,D.	Electronic communications with W. Lewis re: [REDACTED] [REDACTED] Reply in Support of Motion to Compel Discovery	0.30	145.50
02/15/20	Bodney,D.	Review [REDACTED]. [REDACTED] Declaration in Support of Reply in Support of Motion to Compel Discovery	0.20	97.00

PROFESSIONAL SERVICES

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
02/16/20	Bucon,I.O.	Review and revise draft Reply in support of Defendants' Motion to Compel Discovery to reflect [REDACTED] re: same	1.00	395.00
[REDACTED]	[REDACTED]	[REDACTED] [REDACTED] [REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED] [REDACTED] [REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED] [REDACTED] [REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED] [REDACTED] [REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED] [REDACTED] [REDACTED]	[REDACTED]	[REDACTED]
02/17/20	Bodney,D.	Electronic Communications with defense team re: [REDACTED] [REDACTED] Reply in Support of Motion to Compel	0.20	97.00
[REDACTED]	[REDACTED]	[REDACTED] [REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
02/17/20	Bucon,I.O.	Review, revise and proof Reply in support of Motion to Compel Discovery	1.70	671.50
[REDACTED]	[REDACTED]	[REDACTED] [REDACTED] [REDACTED]	[REDACTED]	[REDACTED]

PROFESSIONAL SERVICES

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
02/17/20	Bucon,I.O.	Review and evaluate Reply in support of Motion to Compel Discovery and related Declaration of L. Prather [REDACTED] [REDACTED] [REDACTED]	0.50	197.50
02/17/20	Bucon,I.O.	Review, cite-check and proof Declaration of L. Prather authenticating exhibits to Defendants' Reply in support of Motion to Compel Discovery	0.50	197.50
[REDACTED]	[REDACTED]	[REDACTED] [REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED] [REDACTED] [REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED] [REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED] [REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED] [REDACTED] [REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED] [REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED] [REDACTED] [REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED] [REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED] [REDACTED] [REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED] [REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED] [REDACTED] [REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED] [REDACTED] [REDACTED] [REDACTED]	[REDACTED]	[REDACTED]

PROFESSIONAL SERVICES

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
[REDACTED]	[REDACTED]	[REDACTED] [REDACTED] [REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED] [REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED] [REDACTED] [REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED] [REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED] [REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED] [REDACTED]	[REDACTED]	[REDACTED]
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[REDACTED]	[REDACTED]	[REDACTED] [REDACTED]	[REDACTED]	[REDACTED]
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[REDACTED]	[REDACTED]	[REDACTED] [REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED] [REDACTED] [REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED] [REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED] [REDACTED] [REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED] [REDACTED]	[REDACTED]	[REDACTED]

PROFESSIONAL SERVICES

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
[REDACTED]	[REDACTED]	[REDACTED] [REDACTED] [REDACTED] [REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED] [REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED] [REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED] [REDACTED] [REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED] [REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED] [REDACTED] [REDACTED] [REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED] [REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED] [REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED] [REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED] [REDACTED] [REDACTED] [REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED] [REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED] [REDACTED] [REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED] [REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED] [REDACTED] [REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED] [REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED] [REDACTED] [REDACTED] [REDACTED]	[REDACTED]	[REDACTED]

PROFESSIONAL SERVICES

[illegible]

PROFESSIONAL SERVICES

Date	Name	Description	Hours	Amount
[REDACTED]	[REDACTED]	[REDACTED] [REDACTED] [REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED] [REDACTED] [REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED] [REDACTED] [REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED] [REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED] [REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED] [REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]	[REDACTED]	[REDACTED]

[illegible][illegible]

<u>Date</u>	<u>Description</u>	<u>Amount</u>
[REDACTED]	[REDACTED]	[REDACTED]
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[REDACTED]	[REDACTED]	[REDACTED]
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Phoenix, AZ 85004-2555
Tel 602.798.5400
Fax 602.798.5595
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[REDACTED]

REMITTANCE ADVICE

Client:	072075.00	National Public Radio (NPR)
Matter:	00297341	NPR, et al. adv. Butowsky
Invoice No.:	20200304880	
Date:	March 19, 2020	

[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]

[REDACTED]	
[REDACTED]	
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	

EXHIBIT D

Name	Date	Description	Rate	Hours	Amount
Bucon, I.O.	11/24/2019	Research Fifth Circuit case law re: motion to compel discovery pursuant to Fed. R. Civ. P. 37.	\$395.00	0.60	\$237.00
Bucon, I.O.	11/25/2019	Review local rules re: discovery to prepare to draft motion to compel discovery from Plaintiff.	\$395.00	0.20	\$79.00
Bucon, I.O.	11/25/2019	Draft motion to compel discovery from Plaintiff pursuant to Fed. R. Civ. P. 37.	\$395.00	0.90	\$355.50
Bucon, I.O.	11/26/2019	Continue to draft motion to compel discovery from Plaintiff pursuant to Fed. R. Civ. P. 37.	\$395.00	1.20	\$474.00
Bucon, I.O.	11/27/2019	Review and evaluate local rules re: discovery disputes to inform strategy for motion to compel.	\$395.00	0.20	\$79.00
Bucon, I.O.	12/10/2019	Research and analysis of Fifth Circuit case law re: discovery objections, motion to compel and sanctions.	\$395.00	1.00	\$395.00
Bucon, I.O.	12/10/2019	Draft motion to compel discovery re: plaintiff's deficient discovery responses.	\$395.00	0.70	\$276.50
Bucon, I.O.	12/11/2019	Draft motion to compel discovery re: plaintiff's discovery deficiencies.	\$395.00	1.50	\$592.50
Bodney, D.	12/12/2019	Analysis of issues in motion to compel	\$485.00	0.20	\$97.00
Bucon, I.O.	12/12/2019	Research and analyze Fifth Circuit case law re: Rule 37 motions to compel discovery and sanctions.	\$395.00	1.80	\$711.00
Bucon, I.O.	12/12/2019	Draft motion to compel discovery from plaintiff.	\$395.00	2.00	\$790.00
Bodney, D.	12/13/2019	Draft memorandum for clients re: [redacted] motion to compel.	\$485.00	0.70	\$339.50
Bodney, D.	12/13/2019	Revise draft Motion to Compel Discovery.	\$485.00	0.80	\$388.00
Bodney, D.	12/13/2019	Electronic communications with defense team re: Motion to Compel.	\$485.00	0.10	\$48.50
Bucon, I.O.	12/17/2019	Draft, review and revise motion to compel discovery in light of plaintiff's initial document production.	\$395.00	3.00	\$1,185.00
Bucon, I.O.	12/30/2019	Review and revise motion to compel discovery [for: redacted].	\$395.00	2.90	\$1,145.50
Bucon, I.O.	12/31/2019	Review and analyze plaintiff's document production [for: redacted] motion to compel discovery.	\$395.00	2.50	\$987.50
Bucon, I.O.	12/31/2019	Review and revise motion to compel discovery [re: redacted].	\$395.00	2.60	\$1,027.00
Bucon, I.O.	01/02/2020	Review and revise motion to compel plaintiff to comply with defendants' discovery requests.	\$395.00	1.00	\$395.00
Bodney, D.	01/09/2020	Revise motion to compel discovery.	\$485.00	2.00	\$970.00
Bodney, D.	01/09/2020	Teleconference with [client] re motion to compel.	\$485.00	0.50	\$242.50
Bucon, I.O.	01/09/2020	Review and evaluate revised motion to compel plaintiff's discovery responses.	\$395.00	0.50	\$197.50

Name	Date	Description	Rate	Hours	Amount
Bodney, D.	01/10/2020	Revise motion to compel and W. Lewis Declaration, including references to rules and exhibits.	\$485.00	3.00	\$1,455.00
Bodney, D.	01/10/2020	Teleconference with [client] re motion to compel [redacted].	\$485.00	0.10	\$48.50
Bodney, D.	01/11/2020	Revise draft Motion to Compel and Declaration.	\$485.00	3.70	\$1,794.50
Bodney, D.	01/11/2020	Electronic communication with client re draft Motion to Compel and Declaration in support thereof.	\$485.00	0.20	\$97.00
Bodney, D.	01/13/2020	Attention to service and filing issues stemming from Motion to Compel.	\$485.00	0.20	\$97.00
Bodney, D.	01/13/2020	Review client's suggested edits to motion to compel.	\$485.00	0.10	\$48.50
Bodney, D.	01/13/2020	Conferences with I. Bucon re filing of Motion to Compel under seal and possible	\$485.00	0.20	\$97.00
Bodney, D.	01/13/2020	Electronic communications with [client] re [redacted] Motion to Compel.	\$485.00	0.10	\$48.50
Bodney, D.	01/13/2020	Teleconference with W. Lewis re edits to Declaration and filing of Motion to Compel and accompanying exhibits under seal.	\$485.00	0.20	\$97.00
Bucon, I.O.	01/13/2020	Review and revise motion to compel discovery from plaintiff and supporting	\$395.00	1.50	\$592.50
Bucon, I.O.	01/13/2020	Review and analyze plaintiff's document production [for: redacted] motion to compel and accompanying declaration.	\$395.00	1.00	\$395.00
Bucon, I.O.	01/13/2020	Evaluate scope of protective order [re: redacted] motion to compel discovery.	\$395.00	0.30	\$118.50
Bodney, D.	01/14/2020	Review Order re duty to file redacted Motion to Compel.	\$485.00	0.10	\$48.50
Bodney, D.	01/14/2020	Follow-up with W. Lewis and I. Bucon re redaction of Motion to Compel and Exhibits.	\$485.00	0.20	\$97.00
Bucon, I.O.	01/14/2020	Review and analyze stipulated protective order to evaluate scope of necessary redactions for public motion to compel.	\$395.00	1.30	\$513.50
Bodney, D.	01/15/2020	Review, analyze and supplement proposed redacted versions of motion to compel and exhibits thereto.	\$485.00	0.40	\$194.00
Bodney, D.	01/15/2020	Electronic communications with client re [redacted] motion to compel.	\$485.00	0.10	\$48.50
Bucon, I.O.	01/15/2020	Review motion to compel and evaluate redactions necessary to prevent disclosure of information protected by stipulated protective order.	\$395.00	2.50	\$987.50
Bodney, D.	01/16/2020	Electronic communication with [client] re [redacted] motion to compel.	\$485.00	0.10	\$48.50
Bodney, D.	02/03/2020	Review and analysis of Plaintiff's Response to Motion to Compel	\$485.00	0.20	\$97.00
Bodney, D.	02/04/2020	Electronic communications with L. Prather re: reply in support of motion to compel	\$485.00	0.20	\$97.00

Name	Date	Description	Rate	Hours	Amount
Bucon, I.O.	02/04/2020	Review and evaluate Plaintiff's Response to Defendants' Motion to Compel Discovery	\$395.00	0.50	\$197.50
Bodney, D.	02/06/2020	Review client e-mail re: [redacted] reply in support of motion to compel	\$485.00	0.20	\$97.00
Bucon, I.O.	02/06/2020	E-mail correspondence from [client] re: reply in support of motion to compel discovery from plaintiff	\$395.00	0.10	\$39.50
Bodney, D.	02/07/2020	Electronic communications with client and defense team re: reply in support of motion to compel	\$485.00	0.30	\$145.50
Bucon, I.O.	02/07/2020	Review and evaluate reply in support of motion to compel discovery from plaintiff [redacted]	\$395.00	0.80	\$316.00
Bodney, D.	02/08/2020	Conference with W. Lewis and I. Bucon re: Reply in Support of Motion to Compel	\$485.00	0.40	\$194.00
Bodney, D.	02/10/2020	Electronic communications with defense team re: [redacted] Motion to Compel	\$485.00	0.10	\$48.50
Bodney, D.	02/10/2020	Review and revise outline of Reply in Support of Motion to Compel	\$485.00	0.50	\$242.50
Bodney, D.	02/12/2020	Review and revise Reply in Support of Motion to Compel Discovery Pursuant to Fed. R. Civ. P. 37	\$485.00	1.50	\$727.50
Bodney, D.	02/12/2020	Electronic communications with L. Prather re: [redacted] Motion to Compel	\$485.00	0.20	\$97.00
Bucon, I.O.	02/12/2020	Review, evaluate and revise draft reply in support of motion to compel discovery	\$395.00	2.70	\$1,066.50
Bodney, D.	02/13/2020	Teleconference with [client] re: Reply in Support of Motion to Compel	\$485.00	0.20	\$97.00
Bodney, D.	02/13/2020	Electronic communications with client re: Reply in Support of Motion to Compel [redacted]	\$485.00	0.20	\$97.00
Bodney, D.	02/13/2020	Review and revise Reply in Support of Motion to Compel Discovery, including review of proposed exhibits, Plaintiff's Response and exhibits to original Motion	\$485.00	2.90	\$1,406.50
Bucon, I.O.	02/13/2020	Review and revise reply in support of defendants' motion to compel discovery from plaintiff	\$395.00	2.50	\$987.50
Bodney, D.	02/14/2020	Electronic communications with clients re: draft Reply in Support of Motion to Compel Discovery	\$485.00	0.20	\$97.00
Bodney, D.	02/14/2020	Review and analysis of proposed exhibits to Reply in Support of Motion to Compel	\$485.00	0.20	\$97.00
Bodney, D.	02/14/2020	Review [redacted] Reply in Support of Motion to Compel	\$485.00	0.30	\$145.50
Bodney, D.	02/14/2020	Review and revise draft Reply in Support of Motion to Compel	\$485.00	0.70	\$339.50
Bucon, I.O.	02/14/2020	Review, evaluate and proof citations to record and exhibits in draft Reply in support of Motion to Compel	\$395.00	1.50	\$592.50

<u>Name</u>	<u>Date</u>	<u>Description</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
Bucon, I.O.	02/14/2020	Confer with D. Bodney and W. Lewis re: [redacted] Reply in support of Defendants' Motion to Compel Discovery	\$395.00	0.20	\$79.00
Bodney, D.	02/15/2020	Review and revise draft Declaration in Support of Reply in Support of Motion to Compel Discovery Pursuant to Fed. R. Civ. P. 37	\$485.00	0.70	\$339.50
Bodney, D.	02/15/2020	Electronic communications with W. Lewis re: edits to [redacted] Reply in Support of Motion to Compel Discovery	\$485.00	0.30	\$145.50
Bodney, D.	02/15/2020	Review [redacted] Declaration in Support of Reply in Support of Motion to Compel Discovery	\$485.00	0.20	\$97.00
Bucon, I.O.	02/16/2020	Review and revise draft Reply in support of Defendants' Motion to Compel Discovery to reflect [redacted] re: same	\$395.00	1.00	\$395.00
Bodney, D.	02/17/2020	Electronic Communications with defense team re: [redacted] Reply in Support of Motion to Compel	\$485.00	0.20	\$97.00
Bucon, I.O.	02/17/2020	Review, revise and proof Reply in support of Motion to Compel Discovery	\$395.00	1.70	\$671.50
Bucon, I.O.	02/17/2020	Review and evaluate Reply in support of Motion to Compel Discovery and related Declaration of L. Prather [redacted].	\$395.00	0.50	\$197.50
Bucon, I.O.	02/17/2020	Review, cite-check and proof Declaration of L. Prather authenticating exhibits to Defendants' Reply in support of Motion to Compel Discovery	\$395.00	0.50	\$197.50
			Bodney Subtotal		\$11,009.50
			Bucon Subtotal		\$16,274.00
			Grand Total		\$27,283.50